

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY)
)
Approval of Energy Efficiency and)
Demand Response Plan)
)

Docket No. 07-0540

**STAFF OF THE ILLINOIS COMMERCE COMMISSION PREHEARING
MEMORANDUM**

Pursuant to the request made by the Administrative Law Judge at the status hearing held on November 20, 2007, the Staff of the Illinois Commerce Commission ("Staff"), by and through its attorneys, hereby submits its Prehearing Memorandum in the above captioned matter with regard to the energy efficiency and demand response plans submitted by Commonwealth Edison Company ("utility").

Staff through its testimony has addressed and or will address in its brief the following issues:

1. Address whether energy efficiency and conservation-related costs should be allocated among all ratepayers on a uniform per-kWh charge under the utility proposed cost recovery rider mechanism.
2. Address whether the utility coordinated efforts with the Department of Healthcare and Family services.
3. Address whether the utility's plan implements new building and appliance standards.
4. Address whether the utility's plan provides opportunities for a diverse cross-section of customers of all rate classes.

5. Address whether the utility's plan budgets no more than 3% of program revenues to breakthrough equipment and devices.
6. Address whether the utility should be allowed flexibility to modify programs as necessary to meet portfolio load reduction goals.
7. Address whether the utility should update spending limits during the life of the plans.
8. Address whether energy efficiency and demand response measures energy savings should be annualized.
9. Address whether the utility's plan's measures are cost effective
10. Address whether the utility's plan provides for an adequate annual independent evaluation of the plans performance.
11. Address whether the utility proposal to use deemed values to evaluate the plans should be adopted by the Commission.
12. Address whether the Commission should approve a stakeholder process to address measurement and verification of savings for energy efficiency measures.
13. Address whether savings should be based upon actual usage or previously forecasted usage.
14. Address whether the utility should be allowed to bank excess energy savings for the next plan year.
15. Address whether Staff should conduct workshops to solicit comments from interested stakeholders about the attributes of and appropriate procedural vehicle for developing an effective regulatory framework for a demand side portfolio as proposed by the Natural Resources Defense Council.

16. Address the ownership of environmental attributes created when the energy-efficiency measures approved in this case are implemented.

Respectfully submitted,

/s/

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